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**UNITED STATES DISTRICT COURT  
DISTRICT OF NORTHERN CALIFORNIA  
SAN FRANCISCO DIVISION**

COURTNEY MCMILLIAN and RONALD  
COOPER, on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

X CORP., f/k/a/ TWITTER, INC.,  
X HOLDINGS, ELON MUSK, Does,

Defendants.

Case No. 3:23-cv-03461-TLT

**JOINT MOTION FOR ORDER  
CLARIFYING DEADLINE FOR  
RULE 26(a)(1) INITIAL  
DISCLOSURES**

Hon. Trina L. Thompson

Plaintiffs Courtney McMillian and Ronald Cooper (together, “Plaintiffs”) and Defendants X Corporation (f/k/a Twitter, Inc.), X Holdings, and Elon Musk (together, “Defendants”) (collectively, the “Parties”), through their respective undersigned counsel, jointly move this Court for an order clarifying the deadline for the Parties to exchange their Rule 26(a)(1) initial disclosures (or object to providing initial disclosures) as March 7, 2024. In support of their joint motion, the Parties state as follows:

1. On November 2, 2023, Judge Joseph C. Spero entered an order (the “Nov. 2 Order”) setting February 8, 2024, as the “[l]ast day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report[,], and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement.” Dkt. 18. The order also set the Initial Case Management Conference for March 8, 2024.

2. On November 15, 2023, this case was reassigned to Judge Trina L. Thompson. Dkt. 21. On the same date, the Court notified the Parties that the Initial Case Management Conference

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DISCLOSURES**

would be rescheduled for March 14, 2024, and the Joint Case Management Statement would be due by March 7, 2024. Dkt. 22 (“Nov. 15 Clerk’s Notice”).

3. The Parties acknowledge that, based on the Nov. 2 Order and the Nov. 15 Clerk’s Notice, there is some confusion regarding the deadline for initial disclosures. Specifically, the Parties are unsure whether the deadline for exchanging initial disclosures (or, alternatively, stating objections to exchanging disclosures) has been changed to March 7, 2024 (per the Nov. 15 Clerk’s Notice), or remains February 8, 2024 (per the Nov. 2 Order).

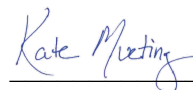
4. On January 24, 2024, the Parties met and conferred regarding initial disclosures. The Parties agree that it is beneficial to exchange initial disclosures (or objections thereto) before the deadline to submit the Joint Case Management Statement and 26(f) Report. To avoid any uncertainty arising from the Nov. 2 Order and the Nov. 15 Clerk’s Notice, the Parties request that the Court enter an order clarifying the Nov. 12 Clerk’s Notice as follows:

Event	Proposed Date
Last day to complete initial disclosures or state objection in Rule 26(f) Report/Case Management Statement and file Rule 26(f) Report/Case Management Statement per Standing Order re Contents of Joint Case Management Statement	March 7, 2024

5. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the new schedule. The Parties will benefit from the Court clarifying the disclosure deadline.

DATED: January 30, 2024

Respectfully submitted,



Kate Mueeting, DC Bar No. 988177

Case No. 3:23-cv-03461-TLT

**JOINT MOTION FOR ORDER CLARIFYING DEADLINE FOR 26(a)(1) INITIAL DISCLOSURES**

(admitted *pro hac vice*)

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DISCLOSURES**